

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION, :
: v. Plaintiff, : 11 Civ. 0691 (LAK)
: 11 Civ. 3718 (LAK)
STEVEN DONZIGER, et al., :
: Defendants. :
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**SUPPLEMENTAL DECLARATION OF RANDY M. MASTRO IN FURTHER
SUPPORT OF CHEVRON CORPORATION'S MOTION TO EXONERATE
CHEVRON'S \$21.8 MILLION BOND**

I, RANDY M. MASTRO, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher, LLP, counsel of record for plaintiff Chevron Corporation ("Chevron") in the above-captioned matter. I make this declaration in further support of Chevron's Motion to Exonerate Chevron's \$21.8 Million Bond.

2. Attached as Exhibit 1 is a true and correct copy the First Amended Complaint and Jury Demand filed by Patton Boggs on March 19, 2012 in *Patton Boggs LLP v. Chevron Corp.*, No. 2:12-cv-00901-ES-CLW (D.N.J.) Dkt. 9.

3. Attached as Exhibit 2 is a true and correct copy of my letter to this Court, dated March 23, 2012.

4. Attached as Exhibit 3 is a true and correct copy of the Memorandum of Law in Support of Patton Boggs LLP's Application for an Order to Show Cause Why Chevron

Corporation Should Not Be Enjoined, Pursuant to the First-Filed Rule, From Taking Any Steps Toward “Exoneration” of the Injunction Bond at Issue in This Proceeding, filed by Patton Boggs on March 21, 2012, in *Patton Boggs LLP v. Chevron Corp.*, No. 2:12-cv-00901-ES-CLW (D.N.J.) Dkt. 10.

5. Attached as Exhibit 4 is a true and correct copy of the letter order, dated March 22, 2012, issued by Judge Salas in *Patton Boggs LLP v. Chevron Corp.*, No. 2:12-cv-00901-ES-CLW (D.N.J. 2012), setting a briefing schedule on Patton Boggs’s Application for Order to Show Cause.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of April, 2012 at New York, New York.



Randy M. Mastro